IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LINDA MIGLIORI, ET AL.,

No. 5:22-cv-00397-JFL

Plaintiffs,

V.

LEHIGH COUNTY BOARD OF ELECTIONS,

Defendant.

PROPOSED INTERVENOR DAVID RITTER'S MOTION TO INTERVENE AS A
PARTY DEFENDANT

Proposed Intervenor David Ritter hereby moves to intervene as a party defendant in the above-captioned matter. Ritter seeks to intervene as of right in this action pursuant to Federal Rule of Civil Procedure 24(a)(2) or, in the alternative, seeks permissive intervention pursuant to Federal Rule of Civil Procedure 24(b)(1)(B). In support of this Motion, Ritter relies on the accompanying Brief in Support, which is incorporated herein by reference.

Pursuant to Rule 24(c), Ritter submits as Exhibit A to the Motion his proposed Answer to the Complaint.

Before filing this Motion with the Court, Ritter sought the concurrence/non-concurrence in the relief requested from Plaintiffs and Defendant via email on January 31, 2022. Counsel for Plaintiffs advised as follows: "Plaintiff do not have a position on your client's proposed intervention." Counsel for Defendant advised as follows: "The Lehigh County Board of Elections does not object to your intervention in this matter."

WHEREFORE, Ritter respectfully requests that the Court grant the Motion and permit him to intervene as a party defendant in this action.

Respectfully submitted,

Dated: February 1, 2022 /s/ Joshua J. Voss

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Attorneys for David Ritter

CERTIFICATE OF CONCURRENCE OR NON-CONCURRENCE

Pursuant to Local Rule 7.1 and Paragraph 2 of the Initial Procedural Order, before filing this Motion with the Court, I sought the concurrence/non-concurrence in the relief requested from Plaintiffs and Defendant via email on January 31, 2022. Counsel for Plaintiffs advised as follows: "Plaintiff do not have a position on your client's proposed intervention." Counsel for Defendant advised as follows: "The Lehigh County Board of Elections does not object to your intervention in this matter."

Respectfully submitted,

Dated: February 1, 2022 /s/ Joshua J. Voss

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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2022, I served the Motion, and the attachments thereto, on all parties via the Court's CM/ECF system.

Dated: February 1, 2022 /s/ Joshua J. Voss

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